

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SAREGAMA INDIA LTD.,

07-CV-7601 (VM)

Plaintiff,

-against-

NOTICE OF MOTION

JAYCEON TAYLOR p/k/a THE GAME,
TIMOTHY MOSLEY p/k/a TIMBALAND,
NATE HILLS, AFTERMATH ENTERTAINMENT,
G UNIT RECORDS, INTERSCOPE RECORDS,
CZAR ENTERTAINMENT, UNIVERSAL MUSIC
GROUP, UNIVERSAL MUSIC AND VIDEO
DISTRIBUTION, INC., BLACK WALL STREET,
EACH 1 TEACH 1, VIRGINIA BEACH MUSIC,
WB MUSIC CORP. and DANJA HANDZ MUZICK,

Defendants.
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PLEASE TAKE NOTICE, that upon the annexed Affidavit of Karen L. Stetson, sworn to on November 30, 2007, and the exhibit attached thereto, the Declaration of Defendant Timothy Mosley p/k/a Timbaland, executed on November 12th, 2007, the accompanying Memorandum of Law in support of this motion, and the pleadings herein, Defendant Timothy Mosley p/k/a Timbaland and Defendant G-Unit Records, Inc. (improperly sued as G Unit Records) will move this Court, before the Honorable Victor Marrero, United States District Judge, at a date and time to be designated by the Court, for an order (i) transferring this action to the United States District Court for the Southern District of Florida pursuant to 28 U.S.C. §1404; or in the alternative, (ii) dismissing Counts I and II of Plaintiff's Complaint insofar as they relate to Plaintiff's sound recording pursuant to Fed.R.Civ.P. 12(b)(1) for lack of federal subject matter jurisdiction; (iii) striking ¶¶ E, H, I, L, M, N and P of Plaintiff's prayer for relief with respect to

certain of Plaintiff's claims as detailed below; and (iv) granting such other and further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE, that any opposing affidavits and answering memoranda of law shall be served within four business days after service of the moving papers.

Dated: Miami, Florida
November 30, 2007

By: s/Karen L. Stetson
Karen L. Stetson
Admitted Pro Hac Vice
Florida Bar No. 742937
Counsel for Defendants
Timothy Mosley p/k/a Timbaland
and G-Unit Records, Inc.
LAW OFFICES OF KAREN L. STETSON
P.O. Box 403023
Miami, Florida 33140

And

Dated: Garden City, New York
November 30, 2007

Alan S. Hock, Esq.
Counsel for Defendants
Timothy Mosley p/k/a Timbaland
and G-Unit Records, Inc.
MORITT HOCK HAMROFF &
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